REMARKS/ARGUMENTS

The Applicant thanks the Examiner for the Office Action, made final, dated June 29, 2006.

Claim Rejections - 35 USC § 103

The Applicant maintains that the present invention would not have been obvious to the skilled person in view of Mori combined with Dymetman.

In the response filed on April 10, 2006, the Applicant did not, as the Examiner suggests, argue that "Dymetman fails to teach and/or suggest the newly added features of *each tag identifies the photograph and its own location on the photograph*". Whilst Dymetman does not explicitly describe photographs *per se*, the Applicant concedes that Dymetman discloses tags identifying a page and its own location on a page. The Applicant and the Examiner agree on this point.

However, claim 1 does not relate to a photograph having tags printed thereon. Rather, claim 1 relates to a method of printing a digital photograph. What the Applicant argues is that the presently claimed method is patentably distinguished from the method of printing taught by either of Dymetman or Mori.

Claim 1 specifies the step of "generating image data for printing said photograph, said image data including tag image data for a plurality of tags, each tag containing coded data identifying said photograph and identifying a location of that tag on said photograph, said tag image data being generated using said photograph identification code".

At no point does Dymetman generate image data which includes tag image data for printing a plurality of location-indicating tags with a photograph. Dymetman plainly generates tag image data and graphical image data separately and prints these in separate printing steps (see column 11, lines 55-65). Hence, Dymetman's interactive pages are not available to users on demand.

Mori describes a system for printing photographs, wherein each photograph has a corresponding photo identification code that may be printed with the photograph in the form of a barcode. Presumably, Mori's photo image data must also include tag image data for

Mori's printed tag (or barcode). Mori is able to generate tag image data for the barcode using known barcode technology.

However, Mori does not describe generating a plurality of location-indicating tags using a photograph identification code. Known barcode technology allows Mori to generate a barcode from a photograph identification code, but it does not allow him to generate a plurality of location-indicating tags, as required by claim 1.

Furthermore, Mori cannot learn how to do this step using the teaching of Dymetman, because Dymetman has plainly not worked out how to do it. Instead, Dymetman teaches generating coded blanks and then separately overprinting with graphical information (see column 11, lines 47-65 of Dymetman). Dymetman does not show the skilled person how to generate tag image data from a photograph identification code.

By contrast, the present application teaches how to generate tag image data for a plurality of location-indicating tags using a photograph identification code. This is described in detail in Sections 7.2.1 and 7.2.2 (pages 73-74) of the specification and this step is explicitly recited in claim 1.

The Applicant therefore maintains that the combination of Mori and Dymetman would not have led the skilled person to arrive at the invention as defined in claim 1. Mori does not teach how to generate a plurality of location-indicating tags from a photograph identification code and neither does Dymetman. Even though Dymetman does describe a document having location-indicating tags printed thereon, these tags are generated in a wholly different manner from the present invention.

It is respectfully submitted that all of the Examiner's objections have been successfully traversed. Accordingly, it is submitted that the application is now in condition for allowance. Reconsideration and allowance of the application is courteously solicited.

Very respectfully,

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